

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

EX PARTE FILING REGARDING GN DOCKET NUMBER 17-183, EXPANDING FLEXIBLE USE IN MID-BAND SPECTRUM BETWEEN 3.7 AND 24 GHz

Dear Ms. Dortch:

There is an ever-increasing need for more spectrum for backhaul, access, Wi-Fi, 5G-mobile, etc. Encina Communications Corporation (“ECC”) proposes that existing and future Part 101 licensees can increase the effective use of their licensed spectrum many times over -- which is preferable to (a) overlaying another application that would cause interference to a percentage of existing licensees and block new applicants, and (b) re-allocating spectrum, which would be disruptive and is simply “robbing Peter to pay Paul.”

Increasing the Effective use of Spectrum

ECC has discovered a way for existing and future Part 101 licensees to not only provide communication between their Point-to-Point licensed stations, but also service RLANs (Access Points and their associated nomadic devices), and 5G-mobile base stations and mobile devices -- collectively, “Other Devices” -- without causing harmful interference to any other incumbents and without blocking any new applicants. This can be accomplished by a licensee ensuring:

- i. That the radiated power from Other Devices (operating on the licensee's frequencies) arriving at any other incumbent station's receiver input is less than the power from the licensee's stations.
- ii. That their Other Devices can accept interference from incumbents and new applicants.

ECC plans to ask the FCC for an experimental license in the 6 GHz band to demonstrate that Part 101 licensed spectrum can be used much more efficiently, and in so doing significantly mitigate the spectrum crunch, without causing harmful interference to any other incumbents and without blocking any new applicants.

Respectfully submitted.

Michael Mulcay, Chairman
Encina Communications Corporation
6701 Democracy Boulevard, MD 201817

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Courtesy copies to:

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